

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY  
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ELECTRONICALLY FILED  
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DATE FILED: 1/28/14

SECURITIES AND EXCHANGE  
COMMISSION,

*Plaintiff,*

v.

SAMUEL E. WYLY and DONALD R. MILLER,  
JR., in his capacity as the Independent Executor of  
the Will and Estate of Charles J. Wyly, Jr.,

*Defendants,*

and

CHERYL WYLY *et al.*,

*Relief Defendants.*

No. 1:10-cv-05760-SAS

STIPULATION AND  
~~PROPOSED~~ ORDER  
REGARDING DONALD R.  
MILLER, JR. AND  
MARTHA WYLY MILLER

Plaintiff Securities and Exchange Commission and Relief Defendants Donald R. Miller, Jr. and Martha Wyly Miller (the "Millers"), through their undersigned counsel, hereby stipulate as follows:

WHEREAS, on November 3, 2014, the Court issued an Order Temporarily Freezing Assets and Granting Other Relief (ECF No. 518) (the "Freeze Order"), which has frozen the Millers' assets subject to the terms of the Freeze Order;

WHEREAS, the Millers have advised the SEC that a new water heater and repair to the outside lighting their property at 6800 Hunters Glen, Dallas, Texas, are necessary to protect and preserve the value of the property;

WHEREAS, the Millers also have advised the SEC that removal of a dead tree at their real property at 212 Brentwood, Trinidad, Texas, is necessary to protect and preserve the value of the property;

WHEREAS, the Millers estimate that the combined cost of these maintenance projects will be approximately \$10,000; and

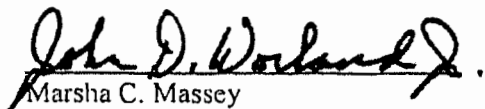
WHEREAS, the SEC does not object to the Millers' expenditure of such sum for such purposes,

IT IS HEREBY STIPULATED AND AGREED THAT:

1. The Freeze Order is modified to permit the Millers to spend up to \$10,000 on the maintenance projects described above; and
2. Such expenditures shall not be counted against the Miller's monthly allowances for living expenses in the Freeze Order and will not violate the Freeze Order.

January 27, 2016

Respectfully submitted,

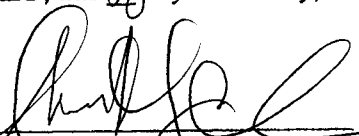


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*Attorneys for Relief Defendants  
Donald R. Miller, Jr., in his individual capacity,  
and Martha Wyly Miller*

SO ORDERED, this <sup>28</sup> day of January, 2016.

  
HONORABLE SHIRA A. SCHEINDLIN  
UNITED STATES DISTRICT JUDGE